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Jack Danayan

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA, SOUTHERN DIVISION

HELPING HANDS WELLNESS CENTER,
INC., a Nevada corporation,

Plaintiff,

v.

LUSINE DANAYAN, an individual; JACK
DANAYAN, an individual,

Defendants.

Case No. 2:19-CV-00881-JCM-NJK

**STIPULATION AND ORDER TO STAY
LITIGATION**

The Hon. James C. Mahan

Trial Date: None Set

STIPULATION AND ORDER TO STAY LITIGATION

LUSINE DANAYAN and JACK DANAYAN (hereinafter "Defendants") and HELPING
HANDS WELLNESS CENTER, INC., a Nevada Corporation (hereinafter "Plaintiff") (collectively,
"the Parties") by and through their respective counsel, hereby stipulate and agree as follows:

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1 1. That the litigation in the entitled matter, *Helping Hands Wellness Center, Inc. v. Lusine*
2 *Danayan, et al.*, Case No. 2:19-cv-00881-JCM-NJK ("the Action") shall be stayed through July 5,
3 2019 to allow the parties further time to attempt to resolve the instant matter and not incur
4 unnecessary litigation fees and costs.

5 2. That Defendants' opposition to Plaintiff's Emergency Motion to Remand to State Court
6 [ECF No. 5], which is currently due on June 11, 2019, will now be due on Monday, July 8, 2019 in
7 the event the parties do not file a notice of settlement on or before July 5, 2019 or seek a further stay
8 of the instant matter. Plaintiff's reply brief shall be due on or before July 10, 2019.

9 3. That Defendants' Opposition to Motion for Preliminary Injunction [ECF No. 6], which
10 is currently due on June 17, 2019, will now be due on or before Monday, July 15, 2019 in the event
11 the parties do not file a notice of settlement on or before July 5, 2019 or seek a further stay of the
12 instant matter. Plaintiff's reply brief shall be due on or before July 20, 2019.

13 4. That Defendants' responsive pleading to Plaintiff's Complaint, which is currently due
14 on or before June 13, 2019, will now be due on Monday, July 15, 2019 unless the parties seek a
15 further stay of the matter.

16 5. Defendants agree not to file a motion to disqualify Plaintiff's counsel at any time during
17 the agreed upon stay through July 5, 2019.

18 6. Defendants shall submit a timely and adequate resolution proposal to Plaintiff no later
19 than Friday, June 14, 2019 at 5:00 p.m. In the event that Defendants fail to timely submit an adequate
20 resolution proposal, Plaintiff can seek to lift the stay prior to July 5, 2019.

21 7. The Parties agree that the instant Stipulation and Order for Stay of Litigation shall not
22 be construed as a waiver of any claims. Instead, the Stipulation and Order is merely a vehicle for the
23 parties to attempt to resolve the instant matter.

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The parties hereto further agree that this Stipulation may be executed in one or more counterparts, each of which shall constitute a duplicate original.

JK LEGAL & CONSULTING, LLC

WOOD SMITH HENNING & BERMAN, LLP

By: /s/ Jared Kahn

By: /s/ Christina M. Mamer

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ORDER

The Court having reviewed the foregoing STIPULATION AND ORDER TO STAY LITIGATION in the above-entitled matter and for good cause appearing therefor:

IT IS SO ORDERED that the litigation in the above-referenced matter be stayed through July 5, 2019 unless further stayed by stipulation of the parties.

IT IS SO ORDERED that Defendants' Opposition to Plaintiff's Emergency Motion to Remand to State Court [ECF No. 5], which is currently due on June 11, 2019, will now be due on Monday, July 8, 2019 in the event the parties do not file a notice of settlement on or before July 5, 2019 or seek a further stay of the instant matter. Plaintiff's reply brief shall be due on or before July 10, 2019.

IT IS SO ORDERED that Defendants' Opposition to Motion for Preliminary Injunction [ECF No. 6], which is currently due on June 17, 2019, will now be due on or before Monday, July 15, 2019 in the event the parties do not file a notice of settlement on or before July 5, 2019 or seek a further stay of the instant matter. Plaintiff's reply brief shall be due on or before July 20, 2019.

IT IS SO ORDERED that Defendants' responsive pleading to Plaintiff's Complaint, which is currently due on or before June 13, 2019, will now be due on Monday, July 15, 2019 unless the parties

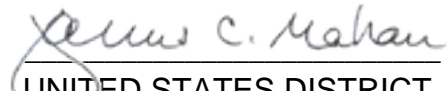
1 seek a further stay of the instant matter.

2 **IT IS SO ORDERED** that Defendants are precluded from filing a motion to disqualify
3 Plaintiff's counsel at any time during the agreed upon stay through July 5, 2019.

4 **IT IS SO ORDERED** that Defendants shall submit a timely and adequate resolution proposal
5 to Plaintiff no later than Friday, June 14, 2019 at 5:00 p.m. In the event that Defendants fail to timely
6 submit an adequate resolution proposal, Plaintiff can seek to lift the stay prior to July 5, 2019.

7 **IT IS SO ORDERED** that that the instant Stipulation and Order for Stay of Litigation shall
8 not be construed as a waiver of any claims. Instead, the Stipulation and Order is merely a vehicle for
9 the parties to attempt to resolve the instant matter.

10 Dated: June 17, 2019.

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12 UNITED STATES DISTRICT JUDGE
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